

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

1. SUSAN MCKENZIE-NEVOLAS,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. CIV-12-570-D
2. DEACONESS HOLDINGS, LLC,)	Honorable Timothy DeGiusti
)	
)	
Defendant.)	

**DEFENDANT’S UNOPPOSED APPLICATION TO ENLARGE
DATES IN SCHEDULING ORDER**

COMES NOW Defendant, Deaconess Holdings, L.L.C., (“Deaconess”) and respectfully moves this Court to enlarge the remaining deadlines in the Scheduling Order by thirty (30) days and reschedule the June trial docket after July 18, 2013.¹ In support of the instant motion, the following is offered for this Court’s review and consideration:

1. The parties scheduled and attended mediation in this case on February 22, 2013.
In light of this mediation date, the parties postponed several depositions and other discovery issues. Unfortunately, the February 22, 2013 mediation was unsuccessful.
2. An enlargement of time of the remaining scheduling order dates is necessary to adequately complete the remaining discovery in this case and prepare motions.

¹ Defendant respectfully requests that trial be scheduled after July 18, 2013 as the attorney who will be trying the case, David Strecker, will be out of the country the last week in June and first two weeks in July 2013.

3. Defendant's counsel has conferred with Plaintiff's counsel and Plaintiff's counsel has stated that she does not object to this motion.
4. Defendant has made one previous request for an extension of all remaining scheduling order deadlines.²
5. The instant motion is brought in good faith and not intended for delay or postponement.

WHEREFORE, the Defendant respectfully requests this Court enter an order to extend all remaining dates in the Scheduling Order by thirty (30) days and to reschedule the June trial docket after July 18, 2013.

Respectfully submitted,

/s/Jessica C. Ridenour
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ATTORNEYS FOR DEFENDANT

² The first request for an extension of all remaining scheduling order deadlines was made on November 28, 2012, due to difficulty obtaining medical records.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 27th day of February, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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